



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 8**

1595 Wynkoop Street  
Denver, CO 80202-1129  
Phone 800-227-8917  
[www.epa.gov/region08](http://www.epa.gov/region08)

NOV 10 2014

Ref: 8EPR-N

Mary Erickson, Forest Supervisor  
Custer - Gallatin National Forests  
P.O. Box 130  
Bozeman, MT 59771

Re: Greater Red Lodge Habitat and Vegetation  
Management Project Final Environmental Impact  
Statement, CEQ # 20140277

Dear Ms. Erickson:

The U.S. Environmental Protection Agency Region 8 received: (1) the Final Environmental Impact Statement (EIS) for the Greater Red Lodge Habitat and Vegetation Management Project, prepared by the USDA Forest Service (USFS), (2) the draft Record of Decision (ROD) for reconstructing Nichols Creek Road in the Willow-Nichols Creek Project Area; and (3) draft ROD for the Greater Red Lodge Vegetation and Habitat Management Project. We have completed a review pursuant to our responsibilities and authority under Section 102(2)(C) of the National Environmental Policy Act (NEPA). Section 309 of the Clean Air Act directs the EPA to review and comment in writing on the environmental impacts of any major federal agency action.

**Project Background**

The Custer National Forest, Beartooth Ranger District is proposing the Greater Red Lodge Habitat and Vegetation Management Project to reduce hazardous fuels in the wildland urban interface near the City of Red Lodge and community of Luther, MT; maintain and improve resiliency of forest vegetation and grasslands; enhance aspen habitat; and improve water quality. The Final Environmental Impact Statement (EIS) evaluates the impacts of a No Action Alternative (Alt 1) and three action alternatives that consider vegetation and fuels management on approximately 1000 – 2000 acres depending upon the alternative, as well as reconstruction of Nichols Creek Road and about 4 miles of road decommissioning to improve water quality.

The draft RODs authorize all road reconstruction activities for Nichols Creek Road as described in this decision, the FEIS, and project record, and select Alternative 3 Modified for the Red Lodge Creek (RLC) Project Area, and Alternative 2 Modified for the Willow-Nichols Creek (WNC) Project Area for the rest of the project actions.



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## EPA Evaluation

The FEIS and draft RODs show the careful consideration of project impacts by the USFS. The EPA appreciates the additions of maps that define wetlands and impaired water quality streams. The FEIS recognizes that there will be increased short-term impacts on stream water quality during implementation of the project, most notably from increased sediment loads. The EPA understands that the reconstruction of Nichols Creek Road should result in long-term positive impacts on stream water quality. We also note that the FEIS states that sediments yields are predicted to recover to background conditions within five years of project implementation.

The draft RODs incorporate numerous best management practices (BMPs) and criteria to address the water quality impacts. We encourage the USFS to assure implementation and monitoring of these measures so as to minimize water quality impacts.

We support the USFS commitment to protect natural resources. If you have any questions, please contact me at (303) 312-6704. You may also contact Lisa Lloyd, NEPA lead reviewer, at (303) 312-6537 or by email at [lloyd.lisa@epa.gov](mailto:lloyd.lisa@epa.gov).

Sincerely,



Philip S. Strobel  
Acting Director, NEPA Compliance and Review Program  
Office of Ecosystems Protection and Remediation

cc: Amy Waring, USFS